

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

COURTNEY LINDE, et al.,

Plaintiffs,

- against -

ARAB BANK, PLC,

Defendant.

CV-04-2799 (BMC)(VVP)
and all related cases¹

**DEFENDANT ARAB BANK PLC'S MOTION *IN LIMINE* TO EXCLUDE
CERTAIN CATEGORIES OF PLAINTIFFS' CASE-IN-CHIEF EXHIBITS**

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¹ *Little, et al. v. Arab Bank, PLC*, No. CV-04-5449 (E.D.N.Y. 2004) (BMC) (VVP); *Almog v. Arab Bank, PLC*, No. CV-04-5564 (E.D.N.Y. 2004) (BMC) (VVP); *Coulter, et al. v. Arab Bank, PLC*, No. CV-05-365 (E.D.N.Y. 2005) (BMC) (VVP); *Afriat-Kurtzer v. Arab Bank, PLC*, No. CV-05-388 (E.D.N.Y. 2005) (BMC) (VVP); *Bennett, et al. v. Arab Bank, PLC*, No. CV-05-3183 (E.D.N.Y. 2005) (BMC) (VVP); *Roth, et al. v. Arab Bank, PLC*, No. CV-05-3738 (E.D.N.Y. 2005) (BMC) (VVP); and *Weiss, et al. v. Arab Bank, PLC*, No. CV-06-1623 (E.D.N.Y. 2006) (BMC) (VVP).

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Defendant Arab Bank plc (the “Bank”) respectfully moves for entry of an order deeming inadmissible each of the Plaintiffs’ exhibits addressed herein.² The exhibits remain on Plaintiffs’ case-in-chief exhibit list in the face of contrary determinations from this Court at the July 30, 2013 hearing. These rulings followed the parties’ submission of motions *in limine* in the First Supplement to the Joint Pre-Trial Order (ECF No. 970).³

I. THE BOOK ENTITLED *THE INDOMITABLE ARAB*, ARAB BANK’S ANNUAL REPORTS FROM YEARS NOT IN ISSUE, AND RELATED DOCUMENTS

The Bank’s *in limine* motion No. 1 sought the exclusion of the following category of documents:

[a]ll evidence concerning the book entitled THE INDOMITABLE ARAB: THE LIFE AND TIMES OF ABDUL HAMEED SHOMAN (1890-1974) FOUNDER OF ARAB BANK (Third World Center, 1st ed. 1984), Arab Bank annual reports, including reports dated between 1956 and 1971 and referencing Israel as an “enemy,” Arab Bank calendars referencing events of aggression, and any “donations” or “contributions” by employees or officers of the Bank purportedly made “in support of the Al-Aqsa Intifada.”

(MIL No. 1.) This motion addressed Plaintiffs’ exhibits PX 45 (*The Indomitable Arab*) and PX 78-84 and PX 4746 (Arab Bank annual reports from 1956 to 1971). (See Ex. A, I.)

Considering this category of documents, the Court noted that this “*might be the place where all probative value eludes us . . .*” (See July 30, 2013 Hr’g Tr. at 120:23-121:2 (emphasis supplied)). Accordingly, the Court ruled that these documents “may be usable for impeachment only, *not as substantive evidence of the plaintiffs’ case.*” (See *id.* at 122:14-17 (emphasis supplied)). In apparent defiance of this ruling, Plaintiffs continue to list these documents as case-in-chief exhibits. These exhibits should be excluded.

² A schedule of the Plaintiff Exhibit numbers (“PX __”) addressed in each section of this memorandum is annexed as Exhibit A (“Ex. A”). These PX numbers refer to the exhibit numbers listed in Plaintiffs’ Revised Exhibit List, filed by Plaintiffs on July 18, 2014 as Exhibit A to “Plaintiffs’ Updated Proposed Pretrial Order” (ECF No. 1027(2)).

³ The Bank’s numbered *in limine* motions, as listed in the First Supplement to the Joint Pre-Trial Order and referenced by the Court during the hearing dated July 30, 2013, are referenced herein as “motion *in limine* No. __” or “MIL No. __.”

II. HOLY LAND FOUNDATION TRIAL EXHIBITS

Plaintiffs' revised exhibit list also includes 34 documents (*see* Ex. A, II, listing PX numbers) which Plaintiffs obtained in connection with a criminal prosecution of the Holy Land Foundation for Relief and Development ("HLF"). The Bank sought to exclude these documents in its *in limine* motion No. 5 and at the Court concluded that unless these third-party documents can be authenticated, and additionally demonstrated not to constitute hearsay, they would not be admitted:

THE COURT: . . . To the extent that the plaintiffs seek to admit documents that were produced to them from defendant, those are admissible. To the extent documents were referred in the first request for admissions, those are admissible. To the extent there's other documents, they are going to have to be authenticated and proven to be non-hearsay as any other document would.

(July 30, 2013 Hr'g Tr. at 116-17.) The 34 documents addressed in this category were not produced by the Bank, nor were they the subject of the first request for admissions. Plaintiffs continue to list, for example, PX 1077 which is a 1991 letter from an unstated author to an unknown recipient, described by Plaintiffs in their revised exhibit list as follows: "Letter that elaborates the level of control Hamas has on various Zakat committees." (*See* Pls.' Revised Ex. List (ECF No. 1027(2), PX 1077.) Similarly, PX 1063 purports to be a transcript of an audio recording of a conversation between someone named "Akram," someone named "Muin," and 11 other persons, and is described by Plaintiffs in their revised exhibit list as "Transcript from 1993 'Philadelphia Meeting'." (*See id.*, PX 1063.)

Plaintiffs cannot authenticate any of these HLF documents. But even were they somehow able to do so, all of them are plainly intended to be introduced for the truth of matters stated within them, and are rank hearsay. These 34 HLF documents cannot reasonably be "authenticated and proven to be non-hearsay" as this Court has already required. Accordingly, they should be excluded.

III. ISRAELI GOVERNMENT MEMOS, BULLETINS AND OTHER RELEASES

Plaintiffs' designate 41 documents (*see* Ex. A, III, listing PX numbers) which were the subject of the Bank's *in limine* motion No. 7, seeking the exclusion of "intelligence reports by the Israeli government and other third parties" as inadmissible hearsay. This category of documents includes memoranda, bulletins and other releases purportedly from government agencies – the Israeli Ministry of Foreign Affairs, the Israeli Prime Minister's Office, the Israeli police, the Israeli Security Agency, the Israel Defense Forces and the Israeli Civil Administration. (MIL No. 7.) The Court agreed that such documents are problematic:

The hearsay objection motions, that is defendant's . . . [*in limine* motion number] 7 . . . , I thought most of these are pretty good objections Each seems to me to the extent the plaintiffs are seeking to put in, for example, documents that can't be authenticated . . . it's a problem for the plaintiffs.

(July 30, 2013 Hr'g Tr. at 105:4-10.) As Plaintiffs themselves noted at the July 30 hearing: "There's no exception in the hearsay bar for musings of government officials" (*Id.* at 70:24-25.)

Yet Plaintiffs continue to designate such documents, including the following document referenced in the Bank's motion as an example: "a May 6, 2002 IDF report entitled "Large Sums of Money Transferred by Saudi Arabia to the Palestinians are Used for Financing Terrorist Organizations (Particularly the Hamas) and Terrorist Activities (Including the Suicide Attacks Inside Israel)." (*See* MIL No. 7; *see also* Pls.' Revised Ex. List (ECF No. 1027(2)), PX 509.) Plaintiffs similarly continue to list another document cited in the Bank's *in limine* motion No. 7, described by them as an "IDF Intelligence Corps Report: "Islamic Charitable Associations in the Territories and Their Connection to Hamas." (*See id.*, PX 1492.)

Plaintiffs cannot authenticate these documents, nor can they establish, as this Court has required, that these discrete memoranda, bulletins and releases are anything other than rank hearsay.⁴

A. Israeli Governmental Memos, Bulletins and Releases Cannot Be Authenticated And Lack Foundation.

Pursuant to Federal Rule of Evidence 902(3), a foreign public record is self-authenticating only when: (1) the document “purports to be signed or attested by a person who is authorized by a foreign country’s law to do so,” *and* (2) the document is accompanied by “a final certification by a United States official that the document is genuine.” *Samad Bros., Inc. v. Bokara Rug Co., Inc.*, 09 CIV. 5843, 2012 WL 43613, at *7 (S.D.N.Y. Jan. 9, 2012). *See also* 31 Fed. Prac. & Proc. Evid. § 7137 (1st ed.) (“A document that lacks the requisite signature cannot be self-authenticating under Rule 902(3) even where it has a final certification.”). In most instances, the reports that Plaintiffs have proffered in evidence are not only unsigned, but do not even identify or name any author at all; nor are they accompanied by final certifications.

Plaintiffs have not proffered witnesses with personal knowledge about the drafting of these government agency releases, such that they plainly lack foundation. *See* Fed. R. Evid. 901(b)(1) (establishing “testimony of a witness with knowledge” as a method for authentication). Nor are Plaintiffs able to present evidence that the reports were either “recorded or filed in a public office as authorized by law” or that they are “from the office where items of this kind are kept.” Fed. R. Evid. 901(b)(7).

⁴ PX802, PX1234, PX1235, PX1236, PX1237, PX1239, PX1240 are documents designated by Plaintiffs as purported IDF documents or documents allegedly seized by the IDF. Those documents are separately addressed in the Bank’s bench memo seeking the exclusion of Colin Hames as a witness.

B. The Israeli Governmental Releases Also Constitute Inadmissible Hearsay.

Even were Plaintiffs able to authenticate these documents, they plainly intend to use many of them in an attempt to establish the truth of their attribution allegations, as is evident from Plaintiffs' own descriptions. See, e.g., Ex. A, PX 3811 (described by Plaintiffs as "ISA report on Palestinian suicide bombers (Sept. 2000 - Sept. 2007) . . ."); *id.*, PX 3834 (described by Plaintiffs as "Israeli Prime Minister's Office report on Mike's Place bombers"). Indeed, Plaintiffs' expert Ronni Shaked cites these documents as "proof" of Plaintiffs' allegations. See Shaked Report (ECF No. 822-3 (filed under seal)) at 139, 201 (attributing responsibility to Hamas for Sheffield Club and Mike's Place incidents). In *Gill v. Arab Bank, PLC*, 893 F. Supp. 2d 542, 570-71 (E.D.N.Y. 2012) ("*Gill III*"), Judge Weinstein ruled that the hearsay exception under Federal Rule of Evidence 803(8)(A)(iii) (then Rule 803(8)(C)) addressing "factual findings" from an authorized investigation was not applicable to such releases. Just as in *Gill*, these and many of the other memos and releases now listed as exhibits by Plaintiffs are based in large part on Hamas's own alleged claims of responsibility. These claims thus constitute hearsay within hearsay requiring their own exceptions. See *Gill III* at 571.

Nor, as Judge Weinstein found, do Hamas's claims of responsibility constitute statements against interest. *Id.* at 569 ("Under the perverse assumptions of terrorists, an armed attack on civilians reflects glory. Taking 'credit' for such an attack is deemed a benefit, not a detriment, and is not reliable under the circumstances.")⁵; see also Fed. R. Evid. 803(8) and *Gill III* at 571 (such documents are based largely on the "relaying of information of uncertain

⁵ Plaintiffs' own expert concedes that Hamas has many reasons to falsely claim responsibility for attacks, including: "attention," "recognition," "financial support," "political support," "terrify[ing] its adversaries," forcing "policy changes" and "recruiting." (Kohlmann Dep. (ECF No. 807-4 (filed under seal)) at 237:11-238:12.)

provenance,” by unreliable sources not subject to cross-examination and therefore lack “trustworthiness.”⁶

Because these 41 Israeli memos, bulletins and other releases cannot be authenticated and, in any event, constitute inadmissible hearsay, they should be excluded.

IV. ISRAELI MILITARY COURT DOCUMENTS

Plaintiffs’ exhibit list includes 53 Israeli military court documents. (See Ex. A, IV(A), listing PX numbers.) As discussed below, nineteen of these have not been apostilled and therefore cannot be authenticated. (Ex. A, IV (B).) Nine are indictments, for which there is no conceivable permissible use at trial. (Ex. A, IV(C).) All of these Israeli military court documents, described by Plaintiffs with titles such as “revised indictment (plea bargain),” “plea and verdict,” “verdict and sentencing,” “court file,” and “military record,” also should be excluded because they lack reliability.

A. Many Of The Israeli Military Court Documents Cannot Be Authenticated.

Plaintiffs are unable to authenticate the 19 non-apostilled Israeli court documents included in their revised exhibit list. (Ex. A, IV(B).) Unless they are able to present witnesses with personal knowledge concerning the issuance of these court documents—and their witness proffers offer no indication that will be able to do—Fed. R. Evid. 901 requires their exclusion. See *supra* at Section III.A (discussing authentication and foundation).

B. Israeli Military Court Indictments Are Inadmissible.

Nine of the Israeli military court records listed as exhibits are indictments. (Ex. A IV(C).) These indictments are both “hearsay” and “clearly inadmissible for any purpose.” *Ruffalo’s Truck. Serv. v. National Ben-Franklin Ins. Co.*, 243 F.2d 949, 953 (2d Cir. 1957); *In re*

⁶ “[A] trial judge has the discretion, and indeed the obligation, to exclude an entire report or portions thereof—whether narrow ‘factual’ statements or broader ‘conclusions’—that she determines to be untrustworthy.” *Beech Aircraft Corp. v. Rainey*, 488 U.S. 153, 167-68 (1988).

Worldcom, Inc. Securities Litig., No. 02 CIV 3288 (DLC), 2005 WL 375315, *8-9 (S.D.N.Y. Feb. 17, 2005) (“The indictments are not admissible evidence.”); *Gowan v. Amaranth Advisors LLC*, 2014 WL 47774, *10-11 (Bkrtcy. S.D.N.Y. Jan. 3, 2014) (“The Government cannot rely on an indictment to prove its case at trial, and the parties here cannot rely on the Government’s indictment to prove theirs.”). Even when followed by a conviction, the facts alleged in a charging document have not been adjudicated as true. The Israeli indictments listed by Plaintiffs should be stricken.

C. None Of The Israeli Military Court Documents Proffered By Plaintiffs Are Sufficiently Reliable.

All of these 53 court documents, which principally comprise plea bargains and military verdicts, are the records of Israeli military court proceedings conducted against civilians, offered with no indication that they are sufficiently reliable and are not the result of interrogation techniques that would be impermissible in United States criminal proceedings.⁷

Statements that may be the result of military or police interrogation are generally considered to be hearsay, precisely because there is no evidence as to the circumstances under which they were obtained. *See, e.g., In re September 11 Litig.*, 621 F. Supp. 2d 131, 160 (S.D.N.Y. 2009) (“A reasonable person in [the accused’s] place, intent on winning favor from

⁷ *See, e.g.,* Report of the Special Rapporteur on Independence of Judges and Lawyers, U.N. Doc. A/HRC/14/26/Add.1 (June 18, 2010), available at: <http://unispal.un.org/UNISPAL.NSF/0/57> (United Nations report concluding, with regard to the Israeli military justice system, that “the exercise of jurisdiction by a military court over civilians not performing military tasks is normally inconsistent with the fair, impartial and independent administration of justice.”). Interrogation techniques that have been used in Israeli military court proceedings were referenced by the court in *United States v. Salah*, 462 F. Supp. 2d 915, 917-18 (N.D. Ill. 2006):

- (a) The use of hoods, handcuffs, and shackles;
- (b) The ability between interrogation sessions to handcuff a detainee behind the back either to a regular-sized chair in an interrogation room or to a regular-sized or small chair in the hallway where the detainee might also be hooded to avoid the detainee observing other detainees in the hallway;
- (c) Threatening to harm a detainee or threatening to arrest family members of the detainee;
- (d) Depriving the detainee of sleeping conditions by withholding access to a mattress and blankets for up to 48 hours;
- (e) When the interrogator determines that the detainee is withholding information that relates to an imminent threat to human life, and with supervisory approval, slapping a detainee.

his jailers or causing them to stop harsh interrogation methods, might well have been motivated to tell his jailers what he thought they would want to hear, regardless of its truth.”); *Anam v. Obama*, 696 F. Supp. 2d 1, 3 (D.D.C. 2010) (documents containing statements from a prisoner at Guantanamo Bay, Cuba were “tainted by the coercive interrogation techniques to which [the prisoner] was subject and lack sufficient indicia of reliability”). Information “relayed through an interrogator’s account” presents an additional “level of technical hearsay because the interrogator is a third party unavailable for cross examination.” *Al-Bihani v. Obama*, 590 F.3d 866, 879 (D.C. Cir. 2010).

Even were all of these military court records otherwise admissible, as they are not, they should in any event be excluded as evidence lacking sufficient reliability to fit within any hearsay exception.

V. NEWSPAPER ARTICLES

Despite this Court’s admonitions to the contrary, Plaintiffs continue to designate 68 newspaper articles (*see Ex. A, V*, listing PX numbers) which were the subject of the Bank’s *in limine* motion No. 11, seeking the exclusion of “news reports proffered to suggest (a) that the Bank and/or its former chairman supported the Second Intifada (inadmissible hearsay), or (b) purported “knowledge” by the Bank that certain individuals were terrorists and/or that the Saudi Committee was providing support to the Second Intifada (inadmissible hearsay)” (*See MIL No. 11*.) The Bank’s motion listed 16 news articles by way of example, most of which, along with many other such articles, continue to be listed by Plaintiffs. *E.g., compare PX 13, 18 with MIL No. 11(a)(5)* (“Addustour article: Shoman visited the injured in the medical city and gave a personal donation: Employees of Arab Bank donate 5% of their salaries in support of Palestinian Intifada in Jerusalem.”) (*See MIL No. 11; Plaintiffs Revised Exhibit List (ECF No. 1027(2))*, PX 13, 18.)

As this Court clearly stated::

The hearsay objection motions, that is defendant's . . . [*in limine* motion number] 11 . . . , . . . [T]o the extent the plaintiffs are seeking to put in . . . newspaper articles, or things like that, it's a problem for the plaintiffs."

(July 30, 2013 Hr'g Tr. at 105:4-10.) Indeed, newspaper articles are almost always inadmissible hearsay. *See, e.g., Strauss v. Credit Lyonnais, S.A.*, 925 F. Supp. 2d 414, 449 (E.D.N.Y. 2013) ("The newspaper reports are inadmissible hearsay and cannot be relied upon"). Newspaper articles containing quoted remarks, moreover, constitute hearsay within hearsay, requiring an additional exception before they may be admitted. *See, e.g., In re Columbia Sec. Litig.*, 155 F.R.D. 466, 474 (S.D.N.Y. 1984) ("Often, when offered to prove that certain statements were made, newspaper and magazine articles are held inadmissible as hearsay."). Plaintiffs have not put forward any potential hearsay exceptions that could salvage these proposed exhibits.

VI. WEBSITE CAPTURES (PRINTOUTS, COMMUNIQUÉS, PHOTOGRAPHS AND VIDEOS)

Similarly in apparent defiance of this Court's prior rulings, Plaintiffs continue to list among their case-in-chief exhibits 152 printouts, communiqués, photographs and videos that purportedly were captured from websites that Plaintiffs in turn contend, solely in the opinions of their experts, to be controlled by Hamas. (*See Ex. A, VI, listing PX numbers.*)⁸ This Court has already ruled, in response to the Bank's *in limine* motion no. 13, that these documents will not be admitted unless Plaintiffs can properly authenticate them and, if they include hearsay, demonstrate that they fall within a hearsay exception. (*See July 30, 2013 Hr'g Tr. at 118-19.*) Plaintiffs can do neither.

⁸ A few purported website captures designated by Plaintiffs, although not from websites Plaintiffs contend to be controlled by Hamas, are equally inadmissible for the reasons discussed below. These exhibits are the following: PX 761 (purported capture of al-Mujamaa al-Islami website; PX 766 and 812 (purported captures of al-Ansar Charitable Society website); PX 1160-61 (purported capture of Islamic Society-Gaza website); PX 1401 (purported capture of Union of Good website); PX 764 (purported capture of Shahid Palestine website); and PX 1474 (purported capture of Bahrain Forum website).

A. The Website Capture Exhibits Cannot Be Authenticated And Lack Foundation.

As the Court has already ruled:

THE COURT: You know, [regarding Arab Bank *in limine* motion] 13, screen shots of websites? Soliciting donations to support the Second Intifada? You will need to authenticate those Okay. So let me say this, just to say it again, you are going to have to authenticate what you use.

(July 30, 2013 Hr’g Tr. at 118-19.)

To authenticate material from a website, the proponent must show that “the information was posted by the organization/s to which it is attributed.”⁹ Plaintiffs must present evidence that alleged captures from palestine-info.com and alqassam.ps not only accurately reflect pages on those websites, but that Hamas controls those sites and is responsible for the particular posts that they seek to admit. *See In re Homestore.com, Inc. Sec. Litig.*, 347 F. Supp. 2d 769, 782–83 (C.D. Cal. 2004) (“some statement or affidavit from someone with knowledge is required; for example, Homestore’s web master”); *Novak v. Tucows, Inc.*, 06CV1909(JFB)(ARL), 2007 WL 922306, at *5 (E.D.N.Y. Mar. 26, 2007). Plaintiffs’ own expert has conceded that he does not know who controls Hamas’s purported websites, who runs them, who authors posts on them, the source of their information or even whether a particular author has any connection to Hamas whatsoever. (*See Kohlmann Dep.* (ECF No. 807-4 (filed under seal)) at 159:5-12, 233:4-237:10; *see also Kohlmann Crédit Lyonnais Dep.* (ECF No. 807-6 (filed under seal)) at 382:8-387:16.) Nor can Plaintiffs can provide a foundation for the

⁹ *Terbush v. United States*, No. 1:02-CV-5509SMS, 2005 WL 3325954, *5 n.4 (E.D. Cal. 2005), *aff’d in part, rev’d in part on other grounds*; *see also United States v. Jackson*, 208 F.3d 633, 638 (7th Cir. 2000) (“Jackson needed to show that the web postings in which the white supremacist groups took responsibility for the racist mailings actually were posted by the groups”); *Victaulic Co. v. Tieman*, 499 F.3d 227, 236 (3d Cir. 2007) (“Anyone may purchase an internet address, and so, without proceeding to discovery or some other means of authentication, it is premature to assume that a webpage is owned by a company merely because its trade name appears in the uniform resource locator.”).

use of these exhibits, as they are unable to produce any witness with personal knowledge about any of these websites. All of these exhibits must be excluded.

B. The Website Captures Constitute Inadmissible Hearsay.

Moreover, if these exhibits contain hearsay (which they do) and are offered for the truth of their contents (which they will be), then they must fall within an exception to the prohibition against hearsay in order to be admissible, even if they can be authenticated (which they cannot be). (July 30, 2013 Hr’g Tr. at 118-20.) The information contained in these exhibits does not fall within any recognized hearsay exception or exclusion.

“Where postings from internet websites are not statements made by declarants testifying at trial and are offered to prove the truth of the matter asserted, such postings generally constitute hearsay under Fed. R. Evid. 801.” *Novak*, 2007 WL 922306, at *5. As Judge Weinstein previously held in *Gill*, “[t]hese [website] claims are unreliable hearsay that do not fit under any recognized exception that would permit introduction against the Bank.” *See Gill III*, 893 F. Supp. 2d at 569; *see also St. Clair v. Johnny’s Oyster & Shrimp, Inc.*, 76 F. Supp. 2d 773, 775 (S.D. Tex.1999) (“[A]ny evidence procured off the Internet is adequate for almost nothing, even under the most liberal interpretation of the hearsay exception rules.”).

For the reasons noted *supra* at III.B, as found by Judge Weinstein, Hamas’s claims of responsibility cannot be deemed statements against interest that would be admissible pursuant to Fed. R. Evid. 804(b)(3); nor, because of the extremely unreliable nature of these hearsay statements, may Plaintiffs rely upon the rarely permitted residual hearsay exception. Fed. R. Evid. 807 (proponent must provide “name and address of declarant” and statement must have, among other criteria, “circumstantial guarantees of trustworthiness” that are “equivalent”

to statements covered by Rule 803 or 804.”); *see also Gill III*, 893 F. Supp. 2d at 569 (denying application of a residual hearsay exception to these very types of documents).¹⁰

Similarly, although already addressed by the Court in its consideration of the Bank’s *in limine* motion 13, Plaintiffs continue to designate exhibits containing solicitations for donations to the accounts of Hamas leaders and charitable organizations that purported were obtained from the websites of those organizations. Even if these exhibits were capable of authentication, as they are not, these solicitations constitute out-of-court statements introduced to prove the truth of the matters asserted, and they clearly are not subject to any exception for the reasons discussed above. As this Court ruled:

THE COURT: And, again, to the extent those documents are hearsay, they are going to have to fall within the hearsay exception, if you are going to admit them for the truth of what they assert. I’m not telling you anything you don’t know. What I’m saying is I’m granting the defendant’s motion, to the extent that you cannot overcome those obstacles.

(July 30, 2013 Hr’g Tr. at 119-20.) All of Plaintiffs’ 152 website captures should be excluded.

VII. VIDEOS FROM SOURCES OTHER THAN WEBSITES

Plaintiffs’ revised exhibit list also includes 48 video exhibits that do not appear to be, nor are described as being, captures of websites. (*See Ex. A, VII*, listing PX numbers.) Nonetheless, the Court has previously held that videos and photographs proffered by Plaintiffs, even if from sources other than websites, are generally inadmissible if they are unrelated to the issue of attribution for the 24 attacks. (*See July 30, 2013 Hr’g Tr. at 134:22-141:3* (“Photographs and videotapes of the attacks. I see that in the damages phase. I’m not sure I see that in this phase of the trial, especially considering its prejudicial impact.”).)

¹⁰ Judge Weinstein further rejected any claim of a hearsay exception pursuant to Fed. R. Evid. 801(d)(2), regarding a statement of a party or coconspirator, noting that Hamas is not a party to this action and “there is no proof that Hamas and the Bank conspired, or that Hamas and the Bank enjoyed a principal-agent relationship.” *Gill III*, 893 F. Supp. 2d at 569.

Plaintiffs' insistence on designating numerous videos that are completely unrelated to attribution is in plain violation of this Court's order. By way of example, Plaintiffs designate PX 3342, which they describe as "Video of Sbarro aftermath." This video will provide jurors with no information whatsoever about attribution for the Sbarro attack, but will indisputably inflame their passion and prejudice.¹¹ All such videos, unrelated to attribution, should be stricken in accordance with this Court's prior ruling.¹²

VIII. PLAINTIFFS EXPERTS SHOULD NOT BE ALLOWED TO DISCLOSE TO THE JURY OTHERWISE INADMISSIBLE EVIDENCE.

While the Court has "outlined conceptually" that some inadmissible materials, such as videos related to attribution, may be displayed to the jury so that they can assess the credibility of Plaintiffs' expert witnesses (July 30, 2013 Hr'g Tr. at 137-40), Fed. R. Evid. 703 discourages such disclosure. The Bank respectfully urges the Court to deny any such display to the jury. At most, even should the Court consider such disclosure to be warranted, the Bank urges that a description of the videos from Plaintiffs' experts through testimony alone should suffice. Actually showing the videos to the jury will provide them with only limited—if any—additional insight into the expert's credibility, but will undoubtedly create significant additional prejudice to the Bank.

Although Fed. R. Evid. 703 permits experts to rely on inadmissible facts and data in reaching their conclusions, it creates an express presumption against the disclosure of such facts and data to the jury:

¹¹ On July 7, a week before the pre-trial conference, Defendant offered to stipulate that the acts at issue were "acts of international terrorism" within the meaning of the ATA if Plaintiffs identified which witnesses and exhibits would be unnecessary by virtue of that stipulation. Plaintiffs refused to identify what evidence they would withdraw. Defendant's proposal remains outstanding, and, if accepted, presumably would materially shorten the trial.

¹² Even purported videos of Hamas members, which Plaintiffs may seek to use for attribution purposes, plainly constitute hearsay and are not subject to any exception. Even if capable of authentication, they should nonetheless be excluded as well.

An expert may base an opinion on facts or data in the case that the expert has been made aware of or personally observed. If experts in the particular field would reasonably rely on those kinds of facts or data in forming an opinion on the subject, they need not be admissible for the opinion to be admitted. *But if the facts or data would otherwise be inadmissible, the proponent of the opinion may disclose them to the jury only if their probative value in helping the jury evaluate the opinion substantially outweighs their prejudicial effect.*

(Emphasis supplied). The Second Circuit has clearly held that that expert testimony may not be used to circumvent otherwise applicable rules of evidence. *United States v. Mejia*, 545 F.3d 179, 197 (2d Cir. 2008) (a party may not use an expert witness to “simply transmit that hearsay to the jury”). Indeed, in *Estate of Parsons v. Palestinian Auth.*, 715 F. Supp. 2d 27, 33 (D.D.C. 2010), the court discounted the report of Matthew Levitt, Plaintiffs’ expert here, precisely because “[e]xpert opinions may be based on hearsay, but they may not be a conduit for the introduction of factual assertions that are not based on personal knowledge.”

Here, it will be unduly prejudicial to the Bank if Plaintiffs’ expert witnesses are permitted to disclose to the jury inadmissible evidence, including Israeli government agency releases, Israeli military court records, newspaper articles and website captures. *See* 4–703 Weinstein’s Federal Evidence § 703.05[2] (“In balancing the risk of prejudice, the trial court should consider the probable effectiveness of a limiting instruction under the circumstances of the case . . .”); 2 McCormick On Evid. § 324.3 (7th ed. 2013) (“In those instances where the inadmissible facts or data would have an important impact if used for the truth and would therefore be subject to abuse, a danger exists of Rule 703 improperly becoming a ‘backdoor’ hearsay exception.”).

The probative value of these unauthenticated hearsay documents is also nil. Exhibits based, for example, on Hamas’s own claims of responsibility and on multiple levels of hearsay are extremely unreliable and thus ripe for exclusion. *See United States v. Liew*, CR 11-

00573-1 JSW, 2014 WL 554491 (N.D. Cal. Feb. 7, 2014) (expert witness prohibited from testifying about unreliable document that he relied upon); 4–703 Weinstein’s Federal Evidence § 703.05[2] (“In balancing the risk of prejudice, the trial court should consider . . . the apparent authoritativeness of the underlying information.”). Plaintiffs should not be permitted to use their experts as conduits for such questionable and inadmissible materials.

CONCLUSION

For the reasons set forth herein, and pursuant to the prior rulings of this Court, the Bank respectfully urges that all of the PX numbered exhibits listed in Exhibit A be stricken.

Dated: July 21, 2014
New York, New York

Respectfully submitted,

/s/

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EXHIBIT A

Plaintiffs' Inadmissible Exhibits

I. THE BOOK ENTITLED *THE INDOMITABLE ARAB*, ARAB BANK'S ANNUAL REPORTS FROM YEARS NOT IN ISSUE, AND RELATED DOCUMENTS

<u>PX Number</u>	<u>Description¹</u>	<u>Date</u>
45	The Indomitable Arab	1984
78	Arab Bank Annual Report, Arabic	1956
79	Arab Bank Annual Report, English	1964
80	Arab Bank Annual Report, Arabic	1964
81	Arab Bank Annual Report, English	1971
82	Arab Bank Annual Report, Arabic	1971
83	Arab Bank Annual Report, English	1968
84	Arab Bank Annual Report, Arabic	1968
4746	Arab Bank Annual Report, Arabic (Shoman Deposition Exhibit 10)	1969

II. HOLY LAND FOUNDATION TRIAL EXHIBITS

<u>PX Number</u>	<u>Description</u>	<u>Date</u>
1062	Letter from Ahmed Al Kurd to Holy Land Foundation	1/19/2000
1063	Transcript from 1993 "Philadelphia Meeting"	
1064	Tulkarem Zakat Committee Bank Account records from Arab Bank London. The statements are from May 1991-August 1997	9/9/2003
1065	Nablus Zakat Committee's account Records from London. The statements are from September 1991-December 1999	9/9/2003
1068	Jenin Zakat Committee Bank Account records from Arab Bank London. The statements are from September 1991-September 1997	9/9/2003

¹ The descriptions and dates provided herein are those that appear in Plaintiffs' Revised Exhibit List (ECF No. 1027(2)).

<u>PX Number</u>	<u>Description</u>	<u>Date</u>
1073	Al Aqsa Foundation Brochure regarding Al Mujama Al Islami	00/00/2000
1074	A brochure of the Islamic Society Gaza - Jabalia about the society's activities with a recommendation letter by Sheikh Ahmad Yasin	12/22/2000
1077	Letter that elaborates the level of control Hamas has on various Zakat committees.	07/14/1991
1078	A document issued by the Israeli Ministry of Justice: Certification of Designations of Organizations as Unlawful Associations Pursuant to Israel's Defense (Emergency) Regulations (State of Emergency) (1945) and as Terrorist Organizations Pursuant to Israel's Prevention of Terrorism Ordinance, (5708-1948)	06/17/2007
1079	A Poster of senior Hamas leaders (Jamal Mansur and Jamal Salim) and an illegible list of martyrs	07/31/2001
1080	Hamas Document found during IDF search of the Islamic Charitable Society - Hebron discussing close relationship between Hamas's da'wa and the Izz al-Din al-Qassam Brigades.	
1086	Four thank you letters which indicate that Al-Jam'ia al-Islamiya received funds from the Holy Land Foundation	06/10/1994; 12/11/2000
1090	HAMAS Posters	
1101	Hamas poster of Salah Shahada	
1109	Letter from the Jenin Zakat Committee to UoG and Interpal on various charitable projects and funds. The letter shows that JZC received funds from the Al-Aqsa Foundation	1/12/2001

<u>PX Number</u>	<u>Description</u>	<u>Date</u>
1110	Hamas Martyr Poster (Sheikh Ahmed Yassin); seized by the IDF from the office of the Jenin Zakat Committee depicting senior members of Hamas, including Sheikh Ahmed Yassin	
1111	Hamas Martyr Poster (Abd al-Aziz Rantisi) seized by the IDF from the office of the Jenin Zakat Committee depicting senior members of Hamas, including Abd al-Aziz al-Rantisi.	
1112	Hamas Martyr Poster (Muhammad Ali al-Hilwa); seized by the IDF from the office of the Jenin Zakat Committee depicting senior members of Hamas	
1114	Hamas Martyr Poster (Salah al-Din Nur al-Din Darawzeh). seized from the Quran Memorization Committee (of the Nablus Zakat Committee) during an IDF search in June 2002.	
1115	Hamas Martyr Poster (Hashem al-Najar and Hamed Abu Hijla); seized from the Quran Memorization Committee (of the Nablus Zakat Committee) during an IDF search in June 2002.	
1116	(Hamas Key chain with the picture of Sheikh Yassin) seized from the Quran Memorization Committee (of the Nablus Zakat Committee) during an IDF search in June 2002.	
1117	(Hamas Key chain with the picture of Yahya Ayash) seized from the Quran Memorization Committee (of the Nablus Zakat Committee) during an IDF search in June 2002.	

<u>PX Number</u>	<u>Description</u>	<u>Date</u>
1119	P.A. - General Intelligence Service, "Security Work Plan - Accomplishments of the Ramallah-Al-Bireh District Within and Outside of the Work Plan Since the Beginning of the Crisis"	05/22/2000
1124	Posters and other propaganda materials seized from the Tulkarem Zakat Committee during IDF searches in April 2002.	
1125	Posters and other propaganda materials seized from the Tulkarem Zakat Committee during IDF searches in April 2002.	
1126	Posters and other propaganda materials seized from the Tulkarem Zakat Committee during IDF searches in April 2002.	
1128	Posters and other propaganda materials seized from the Tulkarem Zakat Committee during IDF searches in April 2002.	3/27/2002
1129	Posters and other propaganda materials seized from the Tulkarem Zakat Committee during IDF searches in April 2002.	
1130	Posters and other propaganda materials seized from the Tulkarem Zakat Committee during IDF searches in April 2002.	
1131	Posters and other propaganda materials seized from the Tulkarem Zakat Committee during IDF searches in April 2002.	
1299	The 2004 Indictment of HLF identified the Ramallah Zakat Committee as "Hamam-controlled." See, e.g. pp. 19, 24-25 and 27-28.	7/26/2004

<u>PX Number</u>	<u>Description</u>	<u>Date</u>
1353	Certification that Designation and Blocking Memorandum, FAC no. SDT-214876 are true copies of official records, maintained in the Office of Foreign Assets Control, U.S. v. HLF, et al.	1/17/2006
3546	Hamas Claim of Responsibility for Park Hotel Bombing (HLF trial exhibit)	3/27/2002
4731	Blackmore Exhibit 10 - L_C118192-242 - Qalqilya Zakat Committee's London account records	

III. ISRAELI GOVERNMENT MEMOS, BULLETINS AND OTHER RELEASES

<u>PX Number</u>	<u>Description</u>	<u>Date</u>
509	IDF report, titled: "Large Sums of Money Transferred by Saudi Arabia to the Palestinians are Used for Financing Terrorist Organizations (Particularly the Hamas) and Terrorist Activities (Including the Suicide Attacks Inside Israel)"	5/6/2002
1492	IDF Intelligence Corps Report: "Islamic Charitable Associations in the Territories and Their Connection to Hamas"	10/19/2001
1497	ISA Report: Dawa - Hamas' Civilian Infrastructure and its Role in Terror Financing	
1498	IDF Intelligence Corps/Research Branch Report: Financing Terrorism: Transfer of Donations from Charitable Funds Abroad to Charities in the West Bank, Which are Identified with Hamas, Via the Islamic Charitable Society in Hebron	3/20/2003
1501	ISA report: Union of Good - mapping and analysis of terrorist funding system	

<u>PX Number</u>	<u>Description</u>	<u>Date</u>
3216	Israel Police Expert Opinion of Ezra Rachmani	3/31/2004
3241	Israel Ministry of Foreign Affairs report: Details regarding Ayman Halaweh	10/22/2001
3244	Israeli Police forensics report	6/11/2001
3271	Israeli Ministry of Foreign Affairs report on Tel-Aviv suicide bombing at the Dolphinarium June 1, 2001	6/2/2001
3294	Statements to the police by Abdalla Barguthi	March and May 2002
3307	Israel Police - Expert Opinion of Sarah Abramowitz-Bar	11/6/2001
3332	Israeli Ministry of Foreign Affairs report on Suicide bombing at the Sbarro pizzeria in Jerusalem	8/9/2001
3357	Police Expert Opinion of Ron Yaniv	9/11/2002
3358	Israel Police - Expert Opinion of Marko Elmaliah	7/28/2002
3484	Suicide bombing at Café Moment in Jerusalem March 9, 2002	3/9/2002
3485	Police Expert Opinion of Igor Parkman	7/28/2002
3511	Report from the Prime Minister's office re the Silwan Cell	8/21/2002
3513	Report from the Israeli Prime Minister's Office providing details about several terrorist attacks, including the ones in Café Moment and Bus 4.	11/17/2002
3524	Abbas Al Sayed's police interrogation	5/13/2002
3568	Israel Police Records Initial Attack Report of Park Hotel in Netanya	03/28/2002
3625	Israel Police Expert Opinion of Igor Parkman	10/20/2003
3645	Israeli Ministry of Foreign Affairs report on Suicide bombing at Patt junction in Jerusalem - 18-Jun-2002	6/18/2002

<u>PX Number</u>	<u>Description</u>	<u>Date</u>
3661	Israeli Police Forensic Expert Opinion of Ariel Ya'ari	8/28/2002
3692	Police summary on explosive Device Detonated by Suicide Bomber, on "Dan" Bus Line #4 at 99 Allenby	
3764	Report by the Israeli Ministry of Foreign Affairs: ISA- IDF arrest Hamas terrorists connected to Haifa suicide bombing	12/24/2001
3779	Israeli Ministry of Foreign Affairs Publication regarding Bus 37 bombing (Haifa) (www.mfa.gov.il/MFA/MFAArchive/2000_2009/2004/1/Suicide+bombing+of+Egged+bus+No+37+in+Haifa+-+5-Ma.htm)	3/5/2003
3797	Prime Minister's Office report about the Kiryat Arba Shooting	3/7/2003
3811	ISA report on Palestinian suicide bombers (Sept. 2000 - Sept. 2007), including the ones from the Mike's Place bombing.	
3813	Israeli MFA report on Mike's Place suicide bombers	6/3/2003
3819	Israeli Police forensics report	5/5/2003
3834	Israeli Prime Minister's Office report on Mike's bombers	6/15/2003
3855	Israeli Police Forensic Expert Opinion of Igor Peckerman	6/15/2003
3882	Police forensics report.	06/29/2003
3913	Israeli Ministry of Foreign Affairs Report regarding "senior Hamas military wing terrorists Ahmad Uthman Muhammad Bader and Izz al-Din Khader Shams al-Din Misk"	9/9/2003
3917	Israel police report re: Matanya Nathansen	12/10/2003
3950	Police report: Expert Opinion of Sarah Abramowitz-Bar	10/23/2003
3990	Police investigative file re Café Hillel Bombing	10/00/2003

<u>PX Number</u>	<u>Description</u>	<u>Date</u>
4047	Israel Police Forensic Expert Opinion of Yaniv Ron	4/19/2004
4066	ISA document on the Bus 19 attack and its perpetrators	2/2/2004
4236	Israel Security Agency report, The Union of Good - Analysis and Mapping of Terror Funds Network	3/11/2001
4254	Israeli Ministry of Foreign Affairs report on Suicide bombing at the Ben-Yehuda pedestrian mall in Jerusalem	12/1/2001

IV. ISRAELI MILITARY COURT DOCUMENTS

(A) All Israeli Military Court Records

<u>PX Number</u>	<u>Description</u>	<u>Date</u>
1054	Plea and Verdict of Ahmed Salatneh	06/20/2006
1055	Zeid Zakarneh - Indictment, Revised Indictment (Plea Bargain), Verdict	06/20/2006
1060	Ahmed Salatneh's court file	12/19/2005
1224	Jamal Tawil Court file	November 2002 - November 2003
1500	Ahmad Salatneh's Revised indictment	4/12/2005
1506	Sheikh Yassin's Indictment	
3205	Bilal Barghuthi Apostilled verdict and sentencing	01/16/2003
3300	Muhammad Wa'el Daghlis Apostilled Verdict	01/16/2003
3301	Ahlam Tamimi Apostilled verdict and sentencing	06/22/2003 - 10/23/2003
3310	Verdict of Jamal Abed El-Salah Assad Abu Al-Hija. Samaria Military Court Protocol. Case 7227/02	4/11/2005
3311	Revised indictment of Jamal Abd al-Salam Assad Abu-Hija	2/9/2003
3335	Abdalla Barghuthi's indictment	05/29/2003
3336	Abdalla Barghuthi's sentencing	11/30/2004

<u>PX Number</u>	<u>Description</u>	<u>Date</u>
3341	Abdallah Barghouti's verdict	1/6/2003
3354	Muhammad Abdalla Hasan Halabiya Apostilled verdict	02/16/2003
3476	Falah Taher Abdallah Nada Complete Court Record	March -November 2003
3478	Fatma Ibrahim Mahmud Zayed Apostilled verdict and sentencing	07/7-24/2003
3488	Military Record for: Ibrahim Jamil Mar'i Hamed V IDF Military Prosecutor	11/7/2006
3489	Military Record: IDF for: Ibrahim Jamil Mar'i Hamed V IDF Military Prosecutor	07/25/2006
3553	Naser Sami Abd al-Razeq Yataima, Muhanand Talal Mansur Sharim, Mu'mamr Fathi Sharif Abu al-Sheikh and Fathio Raji' Ahmad Khatib's Apostilled verdict and sentencing	04/14/2003
3555	Abas Muhammad Mustafa al-Sayd Apostilled appeals verdict	1/3/2011
3591	Indictment against Ibrahim Hamed, Prosecution File 3181/6, Military Court of Judea	08/21/2006
3617	Fahmi Ayd Ramadan Mushahara Apostilled verdict and sentencing	07/31/2005
3646	Ramadan Mushahara's Revised Indictment	
3647	Ramadan Mushahara's sentencing	07/31/2005
3658	Walid Abd al-Aziz Anjas and Muhammad Hasan Arman's Apostilled sentencing	08/03/2003, 11/30/2003
3686	Mahmud Hamad Mahmud Sharitah Apostilled verdict and sentencing	08/31/2003
3741	Mua'yed Shukri Abd al-Hamid Hamed Apostilled verdict and sentencing	12/18/2006, 07/11/2006
3742	Yaser Hasan Muhammad Hamad Apostilled sentencing	07/16/2006
3743	Jaser Isma'il Musa al-Barghuthi Apostilled indictment and summary of the trial result	3/10/2004

<u>PX Number</u>	<u>Description</u>	<u>Date</u>
3754	Muadh Wael Taleb Abu Sharakh Apostilled verdict and sentencing	02/13-15/2005
3755	Fadi Muhammad Ibrahim Ju'ba Apostilled verdict and sentencing	02/13-15/2005
3782	Abdallah Ahmad Mahmoud Abu Saif's Indictment	11/26/2003
3783	Izz al-Din Khader Shams al-Din Misk Apostilled verdict and sentencing	08/22/2000
3852	Samer Abd al-Sami' Ahmad Atrash Apostilled verdict and sentencing	06/10/2004 - 09/26/2004
3853	Basel Muhammad Shafiq Qawasmeh Apostilled verdict and sentencing	09/17/2000
3881	Omar Saleh Muhammad Faiq Sharif Apostilled verdict and sentencing	09/26/2005, 07/10/2005
3944	Majdi Barakat Abd al-Ghafar Za'tari Apostilled sentencing	9/5/2005
3945	Jalal Jamal Hilmi Yaghmur Apostilled verdict and sentencing	07/11/2005 - 09/22/2005
3946	Abdallah Adnan Yihya Sharibati Apostilled verdict and sentencing	06/14/2005
3947	Nasim Rashed Abd al-Wudud Za'tari Apostilled verdict and sentencing	06/07/2005, 07/11/2005
3986	Fawaz Mahmud Ali Naser Apostilled verdict and sentencing	12/15/2005
3987	Saleh Subhi Dawud Musa Apostilled verdict and sentencing	07/14/2005
4007	Hisham Abd al-Qader Ibrahim Hijaz Apostilled verdict and sentencing	11/14/2005 - 08/16/2006
4008	Khaled Abd al-Mua'z Zein al-Din Omar Apostilled verdict and sentencing	09/13-20/2005
4009	Ahmad Mustafa Saleh Hamed Apostilled verdict and sentencing	05/29/2006, 07/11-16/2006
4010	Murad Walid Khaled Barghuthi Apostilled sentencing	10/05/2006, 11/07/2006
4011	Ahmad Khaled Dawud Hamed Apostilled sentencing	1/8/2006

<u>PX Number</u>	<u>Description</u>	<u>Date</u>
4018	Bahaa Muhammad Fadel Awf Zaheda Apostilled verdict and sentencing	6/7/2005
4019	Bashar Hafez Awf Zaheda Apostilled verdict and sentencing	6/7/2005
4044	Nufal Jihad Nufal Adawin Apostilled verdict and sentencing	10/03/2006 - 12/04/2006
4045	Muhammad Kayed Nashash Apostilled verdict and sentencing	03/15/2006 - 04/09/2006
4714	Plea and Verdict of Ahmed Salatneh	

(B) Non-Apostilled Israeli Military Court Documents

<u>PX Number</u>	<u>Description</u>	<u>Date</u>
1054	Plea and Verdict of Ahmed Salatneh	06/20/2006
1055	Zeid Zakarneh - Indictment, Revised Indictment (Plea Bargain), Verdict	06/20/2006
1060	Ahmed Salatneh's court file	12/19/2005
1224	Jamal Tawil Court file	November 2002 - November 2003
1500	Ahmad Salatneh's Revised indictment	4/12/2005
1506	Sheikh Yassin's Indictment	
3310	Verdict of Jamal Abed El-Salah Assad Abu Al-Hija. Samaria Military Court Protocol. Case 7227/02	4/11/2005
3311	Revised indictment of Jamal Abd al-Salam Assad Abu-Hija	2/9/2003
3335	Abdalla Barghuthi's indictment	05/29/2003
3336	Abdalla Barghuthi's sentencing	11/30/2004
3341	Abdallah Barghouti's verdict	1/6/2003
3476	Falah Taher Abdallah Nada Complete Court Record	March -November 2003
3488	Military Record for: Ibrahim Jamil Mar'i Hamed V IDF Military Prosecutor	11/7/2006

<u>PX Number</u>	<u>Description</u>	<u>Date</u>
3489	Military Record: IDF for: Ibrahim Jamil Mar'i Hamed V IDF Military Prosecutor	07/25/2006
3591	Indictment against Ibrahim Hamed, Prosecution File 3181/6, Military Court of Judea	08/21/2006
3646	Ramadan Mushahara's Revised Indictment	
3647	Ramadan Mushahara's sentencing	07/31/2005
3782	Abdallah Ahmad Mahmoud Abu Saif's Indictment	11/26/2003
4714	Plea and Verdict of Ahmed Salatneh	

(C) Military Court Indictments

<u>PX Number</u>	<u>Description</u>	<u>Date</u>
1500	Ahmad Salatneh's Revised indictment	4/12/2005
1505	Jamal al-Tawil's court records (Indictment, Testimony) ; And two news reports - one about the arrest of Jamal al-Tawil, and the other about Fadel Hamdan.	05/2002-2003
1506	Sheikh Yassin's Indictment	
3311	Revised indictment of Jamal Abd al-Salam Assad Abu-Hija	2/9/2003
3335	Abdalla Barghuthi's indictment	05/29/2003
3591	Indictment against Ibrahim Hamed, Prosecution File 3181/6, Military Court of Judea	08/21/2006
3646	Ramadan Mushahara's Revised Indictment	
3743	Jaser Isma'il Musa al-Barghuthi Apostilled indictment and summary of the trial result	3/10/2004
3782	Abdallah Ahmad Mahmoud Abu Saif's Indictment	11/26/2003

V. NEWSPAPER ARTICLES

<u>PX Number</u>	<u>Description</u>	<u>Date</u>
23	Financial Times Article: Patriarch with a Mission - Profile: Abdulmajeed Shoman	8/12/1998
24	"Shoman calls on Arab businessman to support Intifada Fund"	5/30/2001
25	Article from Ad-Dustur: The Jews Have no Right to Palestine, Shoman to Al Dustur: No Real Arab Support for Palestinians in their Negotiations	7/20/2000
26	advertisement in Jordanian daily Al-Dustur report: Donations requested for the Al-Aqsa Fund	10/7/2000
27	Jordanian daily Ad-Dustur report: The Executive Committee for the Support of the Intifada to Meet Tomorrow	10/16/2000
28	Report in Al-Nahar daily: Islamic March in Ain Al-Hilweh In Support of the Intifada that Criticized Arafat.	10/28/2000
33	Re: Arab Bank Events and Sponsorships - Arab Bank sponsors the event Recognizing Mothers of Martyrs and Prisoners (report by Al-Safir daily)	3/21/2003
294	Hamas will target top Israelis as retribution. The Seattle Times.	8/10/2002
295	CNN: Osama Hamdan, HAMAS Spokesman claiming responsibility for Israel Suicide Bombing.	3/27/2002
464	Al-Jazeera Article on Saudi Committee's activities	10/2/2001
465	Saudi Committee Announcement in Al-Quds newspaper asking the Intifada's Injured who reside in Jerusalem and Bethlehem to arrive to Arab Bank's branches and collect their payments.	11/23/2001

<u>PX Number</u>	<u>Description</u>	<u>Date</u>
484	Al Jazeera newspaper special report on the Saudi Committee; (http://www.al-jazirah.com.sa/2001jaz/feb/10/th1.htm)	10/2/2001
485	Hamed Faleh Mustafa Abu Hijla's Tadamun file	
489	Newspaper article: Saudi telethon funds go direct to Palestinian victims	5/27/2002
490	Newspaper article: Saudi Telethon in support of Palestinians raises SR 410.3 million	04/14/2002
502	Advertisement of the Saudi Committee, calling on beneficiaries to arrive at local Arab Bank branches to collect their payments.	2/18/2002
576	Al-Salah newspaper advertisement about its Ramadan Project Funded by Saudi Committee	
577	Al-Jazirah Newspaper article on the Saudi Committee's Activities	11/22/2002
578	Al-Hayat Al-Jadida article, Saudi Committee Sends \$3 Million via Al-Salah	11/9/2001
602	Arab News article on the Saudi Arabia's telethon for support of Palestinian victims	05/27/2002
1044	Article in Al Quds about charitable org. in Gaza	08/29/2003
1045	Article in Al-Hayat Al-Jadida regarding monthly payments to martyrs families in Gaza by al-Ansar Society	10/23/2001
1104	Hamas charity, Nablus Zakat Committee's complaint to U.S. television network (CBS) regarding news report setting for allegations that the Holy Land Foundation has ties to terrorism.	10/13/1994

<u>PX Number</u>	<u>Description</u>	<u>Date</u>
1157	BBC Report: Palestinian Authority Closes Down Islamic Institutions, Societies	1/1/2002
1158	Financial Times: "Fundamentalists Split Palestinian Unity"	9/9/1988
1159	Knight Ridder Washington Bureau: "Hamas wedding a political event"	7/23/1999
1164	Article from The Independent: The Thin Green Line: "The Gaza school, the Light of Islam kindergarten, is run by the Islamic Society which is controlled by Hamas, the militant Islamic movement..."	8/22/1993
1165	Mail on Sunday article about the Islamic Society in Gaza.	6/30/2002
1167	Sunday Times article about the reaction in the Palestinian street to the Oslo Accord.	9/5/1993
1177	Washington Post, "Radical Movements Thrive on Loose Structure"	8/12/1993
1188	NY Times Article: Kidnapping of Soldier leads Israel to Halt PLO Talks	10/12/1994
1189	The Economist: article about Ahmad Yassin	12/19/1992
1197	Hebrew translation of al-Ayam article about Sheikh Ahmed Yassin praises the contribution of two major Saudi charities	10/8/2003
1201	Associated Press article referencing the Islamic Charitable Society - Hebron (ICSH) and Al-Salah.	2/3/2001
1206	al-Hayat al-Jadida, referencing al-Natshe as a member of the Hamas Political Bureau (Hebrew translation)	11/13/2001

<u>PX Number</u>	<u>Description</u>	<u>Date</u>
1250	BBC Monitoring International Reports, "Palestinian Authority Closes Down Islamic Institutions, Societies, Newspapers,"	1/1/2002
1295	Al-Sharq Al-Awsat daily report, includes the bank account in Arab Bank for the support of the Intifada	9/4/2001
1351	Al-Quds daily report: Al-Ansar Society Distributes Monthly Allocations of Martyrs in Gaza	10/23/2001
1389	Newspaper report about a Follow-Up Committee Report on Donations Granted by Arab States and Arab Popular Organizations to the Palestinian People.	3/25/2001
1392	Report in Filastin al-Muslima: Dr. Ibrahim Al-Yazouri gives an interview to Filastin al-Muslima, about the PA decision to shut down charities.	1/00/1998
1431	al-Watan.com. Ismail Abu Shanab Interview	1/6/2001
1436	The Hamas monthly Filastin al-muslima published an article in October 2006 entitled, "How do the Families of Martyrs Live in Palestine? Hamas's Institutions and Charitable Initiatives Care for Members of the Family, Both Economically and Morally." In the article, reference was made to the 'al-Salah Islamic School for the Children and Orphans of Martyrs,' "which was built by Hamas to care for the children of martyrs and orphans. The school belongs to the al-Salah Charitable Society, which provides many services to the families of martyrs."	10/1/2006
3230	Article in Al-Quds regarding claim of responsibility for the suicide attack in Tel Aviv	4/6/2001

<u>PX Number</u>	<u>Description</u>	<u>Date</u>
3245	Al-Ayyam article: " Hamas" claims responsibility for the Tel Aviv operation, its performer is from Qalqilya	6/4/2001
3308	Obituary of Iz A-Din Shusil Ahmed Al-Masri from Al-Ayyam Newspaper; Claim of responsibility and report about the attack from Al-Ayyam Newspaper	8/10/2001
3330	BBC New Report, "Israel stunned by Jerusalem blast"	8/9/2001
3356	News regarding attack 12.01.2001 Ben Yehuda	
3988	Efrat Weiss article regarding terrorists behind Café Hillel bombing	
4157	Arafat: Hamas using Gaza as launching pad	9/4/1995
4219	Dar al hayat - The Khaled Mishaal Interview	12/31/2003
4231	The Globe and Mail, "Hamas evolves from political to military group"	4/14/1994
4232	New York Times Article: Israeli Raid Snares A Foe, but Leaves Family Motherless	3/4/2003
4233	New York Times: "In Gaza, Peace Meets Pathology"	12/18/1994
4234	The Jerusalem Post: "... Two Hamas leaders, Muhammad Sham'a and Dr. Mahmud al-Zahar, met with PA Chairman Yasir Arafat, Mahmoud Abbas (Abu Mazen), Jamil Surani and Salim Zanun, who serves as spokesman for the Palestinian National Council..."	1/29/1996
4235	New York Times: "Self-Rule Pact is Major Challenge to Islamic Militant Group in Gaza"	11/7/1993
4249	New York Times, An Exhibit On Campus Celebrates Grisly Deed	9/26/2001

<u>PX Number</u>	<u>Description</u>	<u>Date</u>
4729	Haaretz article - "PA freezes Islamic charities' accounts"	
13 18	Addustour article: Shoman visited the injured in the medical city and gave a personal donation: Employees of Arab Bank donate 5% of their salaries in support of Palestinian Intifada in Jerusalem	10/2000
14 494	Ad-Dustur website report re: Abd al-Majid Shoman Abd headed the meeting of the Jordanian Popular Committee in support of Aqsa Intifada.	10/2000
575 483	al Quds article re Saudi Committee	02/14/2002

VI. WEBSITE CAPTURES (PRINTOUTS, COMMUNIQUÉS, PHOTOGRAPHS AND VIDEOS)

<u>PX Number</u>	<u>Description</u>	<u>Date</u>
285	Osama Hamdan interview on Palestine Info website	06/14/2003
286	Osama Hamdan interview on Palestine Info website	08/10/??
288	Transcript of Osama Hamdan interview on Palestine Info website	
289	Hamas calls for donations on the Palestinian Information Center website.	
473	Ayman Halawa bio on al-Qassam Brigades website	
474	Interview with Ayman Halawa's Wife on al-Qassam Brigades website	
528	Arab Labor Organization calls to donate money to bank account 124448 (www.aralo.org)	8/28/2001
531	Information regarding the relationship between the Saudi Committee and the more established Saudi charities.	06/21/2003

<u>PX Number</u>	<u>Description</u>	<u>Date</u>
558	List of Islamic organization and their bank details for donations (www.hamasna.com)	
565	The Union of Good's web: List of member organizations	10/29/2001
570	List of member organizations of Union of Good	02/27/2007
573	Lists of beneficiaries of the Saudi Committee Relief for Palestine on its website	03/13/2005
761	Al-Mujamaa al-Islami's official website displays 17 pictures, one of which is a picture of Hamas leaders, Sheikh Ahmed Yassin and Abdel Aziz Rantisi, titled: "The founders, Yassin and Rantisi	
764	Shahidpalestine Website, List of Martyrs	
766	The Al-Ansar Charitable Society, Gaza website	
812	Al-Ansar Charitable Society website	
1144	Asem Riham tribute Page on al-Qassam Brigades Website	
1154	Ibrahim Al-Muqadama's Bio Page on Palestine Information Center Website	
1160	Article from the Islamic Society-Gaza website about a kindergarten graduation ceremony.	
1161	Letter from Sheik Ahmed Yassin soliciting funds for the Islamic Society of Gaza (from the Islamic Society of Gaza website)	
1300	Islam Online publishes several account numbers through which one can donate money to the Palestinians.	10/14/2000
1401	Union of Good ask for donations on its website	
1432	PLC website: Ahmed Al Kurd's bio	3/8/2011
1452	Article about Hamed Bitawi on the al-Qassam website	4/9/2008

<u>PX Number</u>	<u>Description</u>	<u>Date</u>
1453	Article about Hamas' representatives to the 2006 PLC elections from the Nablus Region on the Palestine Info	
1454	Article about Adli Ya'ish - the mayor of Nablus on behalf of Hamas Palestine-Info website	
1457	Article about Jamal Salim Ibrahim Damuni on the al-Qassam website	
1474	Interview with Abd al-Aziz Rantisi on Bahrain Forum Website	9/9/2001
1476	Biographical details of Riyadh Abu Zaid on Palestine Info website	00/00/2003
1477	Biographical details of Muna Salim Saleh Mansur (Umm Bakr) and her husband Jamal Mansur (Umm Bakr) on Palestine Info website	01/00/2006
1480	The names of the members of the Union of Good were published on the Union of Good's web site.	2/27/2007
3207	Photo of Fadi Amer from Izz al-Din al-Qassam Brigades website	
3213	Tribute page To Fadi Atallah on the al-Qassam Brigades Website	
3222	Izz al-Din al-Qassam Brigades announcement claiming responsibility for the Neve Yamin attack on al-Qassam Brigades website	
3225	The Daily Beast uses a Newsweek interview with Jamal Mansur, titled: "Anatomy of a Assassination"	8/1/2001
3226	Picture of Sa'id al-Hutari, titled: Perpetrator of the Blessed Friday Tel Aviv Operation, 1 June 2001. In Al-Qassam Brigades website.	
3227	Two photos of Sa'id al-Hutari, from Izz al-Din al-Qassam Brigades website	
3228	Photo of Sa'ed Hutari from Izz al-Din al-Qassam Brigades website	

<u>PX Number</u>	<u>Description</u>	<u>Date</u>
3248	Biography of Abd al-Rahman Hamad, on the al-Qassam Brigades website	
3249	Biography of Ayman Halawah, on the al-Qassam Brigades website	
3252	Hamas claims responsibility for the Sa'id Hutari's attack, on al-Qassam Brigades website	6/4/2001
3272	Video of Hamas rally that took place in Tripoli, Lebanon praising Sa'id al-Hutari	
3273	Video of the mourner's tent for martyr Sa'id Hasan Hussein al-Hutari	
3275	Jamal Abu al-Hijaa's bio on al-Qassam Brigades Website	
3276	Picture of Izz al-Din al-Masri in the al-Qassam Brigades website.	
3277	Photo of Izz al-Din al-Masri from Izz al-Din al-Qassam Brigades website	
3278	Photo of Izz al-Din al-Masri from Izz al-Din al-Qassam Brigades website	
3279	Tribute page for Izz al-Din al-Masri on al-Qassam Brigades website (http://www.alqassam.ps/arabic/sohdaa5.php?id=250)	
3287	Izz al-Din al-Masri's Martyr Page on the al-Qassam Brigades website	
3288	Izz al-Din al-Masri's Martyr Page on the Palestine Information Center website	
3314	Photo of Izz al-Din al-Masri on al-Qassam Brigades website	
3324	Official announcement accepting responsibility for the terrorist attack at Sbarro on al-Qassam Brigades website	8/9/2001
3344	Photo of Nabil Halabiya from Izz al-Din al-Qassam Brigades website	

<u>PX Number</u>	<u>Description</u>	<u>Date</u>
3345	Photo of Nabil Halabiya and Osama Id from Izz al-Din al-Qassam Brigades website	
3366	Official announcement of Izz al-Din al-Qassam Brigades claiming responsibility of the for the Ben Yehuda attack on al-Qassam Brigades website	12/1/2001
3370	Pictures of the site after the Ben Yehuda Street attack on al-Qassam Brigades website	
3379	Photo of Asem Rihan from Izz al-Din al-Qassam Brigades website	
3380	Photo of Asem Rihan from Izz al-Din al-Qassam Brigades website	
3381	Photo of Asem Rihan from Izz al-Din al-Qassam Brigades website	
3382	Photo of Asem Rihan from Izz al-Din al-Qassam Brigades website	
3383	Photo of Asem Rihan from Izz al-Din al-Qassam Brigades website	
3385	Al-Qassam Brigades claim of responsibility for the Emanuel attack on July 16, 2002.	
3392	Article from MFA website: Terrorist attack on bus at Emmanuel; December 12, 2001	12/18/2009
3398	Video of the Will of Assem Rihan on al-Qassam Brigades website	
3406	Tribute page to Nasser Assida on al-Qassam Brigades website	
3408	Tribute page to Assem Rihan on al-Qassam Brigades website	
3410	Report about the Emmanuel attack, on al-Qassam Brigades website	
3416	Information re Nasser Assida on Palestine Information Center website	

<u>PX Number</u>	<u>Description</u>	<u>Date</u>
3428	An official announcement of Anan Kadusi death (involved in the Emmanuel Settlement Bombing - 12/12/2001) on the Al-Qassam Brigades website	07/24/2002
3429	Al-Qassam Brigades claim of responsibility for Atzmona Shooting Attack from al-Qassam Brigades website	
3430	Two photos of Muhammad Farahat from Izz al-Din al-Qassam Brigades website	
3431	Photo of Muhammad Farahat from Izz al-Din al-Qassam Brigades website	
3432	Photo of Muhammad Farahat from Izz al-Din al-Qassam Brigades website	
3433	Photo of the suicide bomber Muhammad Fathi Farhat from Pal-Info website	
3434	Al-Qassam Brigades claim of responsibility for Atzmona attack from Pal-Info website	3/7/2002
3466	Al-Qassam Brigades claim of responsibility for Café Moment attack	3/9/2002
3467	Photo of Fuad Hurani from Izz al-Din al-Qassam Brigades website	
3496	Two photographs honoring Fuad Hurani (included in his martyr page in the pictures section) on the Al Qassam Brigades Website	
3509	Muhammad Hasan Arman Bio on the Al Qassam Brigades Website	
3528	Photo of Abd al-Baset Awda	
3529	Martyr's page of Abd al-Baset Awda	
3544	Hamas Park Hotel Claim of Responsibility - on the Al-Qassam Brigades website.	3/27/2002

<u>PX Number</u>	<u>Description</u>	<u>Date</u>
3563	MFA website article: Passover suicide bombing at Park Hotel in Netanya - 27 - Mar-2002	3/27/2002
3598	Official announcement of the Izz al-Din al-Qassam Brigades claiming Sheffield Club Bombing on the Al Qassam Brigades Website	
3602	Muhammad Jamil Nabil Awda martyr page on the Al-Qassam Brigades website	
3611	Al-Qassam Brigades claim of responsibility for the Patt Junction attack	06/18/2002
3612	Photo of Muhammad al-Ghu from Izz al-Din al-Qassam Brigades website	
3613	Martyr's page of Muhammad al-Ghul from al-Qassam website	
3614	Article about of al-Ghul's family	
3628	Izz al-Din al-Qassam Brigades official announcement claiming responsibility for Bus No. 32 attack on the Al-Qassam Brigades website	6/18/2002
3636	Poster prepared by Hamas following the death of Muhanad Taher and pictures from his funeral on the Palestine Information Website	
3644	Muhanad al-Taher's bio and pictures of him and from attacks he initiated on the Al Qassam Brigades Website	6/30/2010
3648	Al-Qassam Brigades claim of responsibility for Hebrew University attack from Pal-Info website	07/31/2002
3650	Biography of Abdalla Barghuthi on the al-Qassam Brigades website	
3651	Hamas claim of responsibility for Hebrew University Bombing	7/31/2002

<u>PX Number</u>	<u>Description</u>	<u>Date</u>
3669	Photographs from the scene of the Hebrew University attack on the Al Qassam Brigades Website	
3680	Al-Qassam Brigades claim of responsibility for Tel Aviv Bus #4 attack	09/19/2002
3694	Izz al-Din al-Qassam official announcement claiming the Bus No. 4 Allenby Street Attack. (published in Iyad Naim Radad's martyr page) on the Al Qassam Brigades Website	6/7/2008
3698	Photograph of suicide bomber Iyad Raddad on his martyr page on the Al Qassam Brigades Website	
3699	Photograph of Iyad Naim Raddad as the perpetrator of the September 19, 2002 attack (Allenby St.) on the Al Qassam Brigades Website	
3719	Special article about al-Qassam cell responsible for several attacks	
3744	Report about Hamas cells from Ramallah, on the Palestine Information Website	
3775	Hamas claim of responsibility for the suicide bombing that was committed by Mahmoud Qawasmeh. On the al-Qassam Brigades website	3/7/2003
3777	Hamas claims responsibility for Mahmud Qawasmeh's attack.	3/7/2003
3780	Al Qassam official claim of responsibility for the Suicide bombing on the No. 37 Bus, Haifa on the Al-Qassam Brigades website	3/7/2003
3781	Al-Qassam brigades claim of responsibility (Tareq Dufash Cell) for Kiryat Arba Shooting Attack	3/7/2003
3786	Photographs of Hazem Qawasmeh on al-Qassam Brigades website	

<u>PX Number</u>	<u>Description</u>	<u>Date</u>
3789	Tribute page for Muhsin Muhammad Omar al-Qawasmeh on the al-Qassam Brigades website	
3790	Tribute page for Hazem al-Qawasmeh on al-Qassam Brigades website	
3807	al-Qassam Brigades claim of responsibility for Mike's Place attack	04/30/2003
3812	Article about the Mike's Place Bombing + claim of responsibility, on the Al-Qassam Brigades website.	
3817	Photos of Hanif and Sharif, Mike's Place perpetrators	
3818	Photos of Hanif and Sharif, Mike's Place perpetrators	
3826	Videotaped will of the two Mike's Place bombers, on Al Qassam Brigades Website	
3837	Picture of Basem Takturi in Al-Qassam Brigades website.	
3838	al-Qassam Brigades claim of responsibility for the Commuter Bus Bombing, Jerusalem	05/18/2003
3839	Martyr's page of Basem al-Takturi, from Izz al-Din al-Qassam Brigades website	
3850	Basel Qawasmeh's Bio on Palestine Information Center Website	
3857	Hamas's claim of responsibility for the Bus No. 6, French Hill bombing, on al-Qassam Brigades website	5/18/2003
3863	Video of Bassam Takturi's Will on youtube	00/00/00
3866	Official Hamas communiqué about the attack of Abd al-Mu'ti Shabana. In Al-Qassam Brigades website.	6/13/2006

<u>PX Number</u>	<u>Description</u>	<u>Date</u>
3868	Picture of Abd al-Mu'ti Shabana, holding two rifles. In Al-Qassam Brigades website.	
3869	Biography of Abd al-Mu'ti Shabana on al-Qassam Brigades website	
3893	Article concerning the Silwad Cell on the al-Qassam Brigades Website	
3909	Picture of Raed Misk, holding a rifle. In Al-Qassam Brigades website.	
3910	Raed Misk - tribute page in the Al-Qassam Brigades website.	
3911	Raed Misk - biography in the old Al-Qassam Brigades website.	
3912	Video of Raed Misk	
3931	Ra'ed Abd al-Hamid Abd al-Razaq Misk's pictures on the al-Qassam Brigades website.	
3952	Hamas's claim of responsibility for the Bus No. 2 Jerusalem attack, on Al Qassam Brigades Website	8/19/2003
3993	Hamas claim of responsibility, naming Ramez Salame Izz al-Din Abu Salim as responsible for the Café Hillel, Jerusalem attack - on Al Qassam Brigades Website	9/10/2003
4030	Rafiq Qanibi's Bio on Al Qassam Brigades Website	
4035	Picture of Ali Ja'ara, holding a rifle, in Al-Qassam Brigades website.	
4049	Izz al-Din al-Qassam claim of responsibility for Bus no. 19 bombing on al-Qassam Brigades website	
4051	Ali Munir Ja'ara's martyr's page from al-Qassam Brigades website	
4073	Al Qassam Brigades claim of responsibility for the Mortar attack at Neve Dekalim on al-Qassam Brigades website	

<u>PX Number</u>	<u>Description</u>	<u>Date</u>
4074	Al Qassam Brigades claim of responsibility for the Mortar attack at Neve Dekalim on al-Qassam Brigades website	
4090	Video of Shahadeh Interview from Al Qassam Brigades Website	
4091	Video of Shahadeh Interview from Al Qassam Brigades Website	
4092	Video of Shahadeh Interview from Al Qassam Brigades Website	
4093	Video of Shahadeh Interview from Al Qassam Brigades Website	
4094	Video of Shahadeh Interview from Al Qassam Brigades Website	
4095	Video of Shahadeh Interview from Al Qassam Brigades Website	
4170	Khalad Mashal Interview with Ghassan Charbel republished on Palestine-Info from Al Hayat	12/6/2003
4181	The Union of Good's web: Joinment Conditions to the Union of Good	10/20/2001
4182	Article about Ahmad Sa'eed Khalil Al-Ja'bari (Abu Muhammad) on al-Qassam Brigades website	9/14/2010
4197	Ibrahim Abd al-Karim Bani Odah's Bio on Palestine Info website	
4198	Martyr's page of Mahmud Abu Hunud on al-Qassam Brigades website	
4712	A movie made by the Izz al-Din al-Qassam Brigades on the life of Muhanad Hafez al-Taher	
4735	Basel Qawasmeh appears as Martyr #193 on the <i>Al-Ansar</i> 's list of martyrs whose families received payments from the <i>Shahid</i> Foundation in Lebanon.	

<u>PX Number</u>	<u>Description</u>	<u>Date</u>
4737	Basel Qawasmeh appears as Martyr #193 on the <i>Al-Ansar</i> 's list of martyrs whose families received payments from the <i>Shahid</i> Foundation in Lebanon.	
454 510	Al-Salah and the Islamic Charitable Society-Hebron chosen by the Saudi Committee to collect information for potential beneficiaries.	

VII. VIDEOS FROM SOURCES OTHER THAN WEBSITES

<u>PX Number</u>	<u>Description</u>	<u>Date</u>
50	NBC Nightly News story about al-Masri family titled "Terror ties at a Middle Eastern bank" - "They told me to go to the Arab Bank and open an account, and you will receive a salary" says the bomber's father, Shuhail Ahmed Al-Masri." (Video Clip)	5/10/2005
1132	Posters and other propaganda materials seized from the Tulkarem Zakat Committee during IDF searches in April 2002.	
1244	Video of Khaled Mash'al and Sheik Yousef Al-Qaradawi	7/16/2007
3215	Picture depicting scene of gas station bombing	
3224	Pictures of Dolphinarium scene	
3238	Pictures of Dolphinarium scene	
3239	Pictures of Dolphinarium scene	
3240	Pictures of Dolphinarium scene	
3281	Video of a conversation between prisoners and interview with Abdalla Barghuthi - from the Ronni Shaked Prison Video Collection	

<u>PX Number</u>	<u>Description</u>	<u>Date</u>
3284	Interview with Abdalla Ghaleb Abdalla Barghuthi - from the Ronni Shaked Prison Video Collection	
3285	Interview with Fatma Hamed Isma'il Masri, the mother of the suicide bomber Izz al-Din Shuhayl Ahmad al-Masri - from the Ronni Shaked Prison Video Collection	
3302	Photo of Sbarro aftermath Inbal Rose can authenticate	
3342	Video of Sbarro aftermath	
3343	Photos of the Sbarro bombing	
3436	Photo of room in building at Atzmona where grenade was thrown	
3437	Photo of jeep in Atzmona with terrorist's bullets	
3482	Photo of bombing that Inbal Rose took	
3483	Picture in immediate aftermath of Café Moment bombing	
3532	Interview with Abbas al-Sayd - from the Ronni Shaked Prison Video Collection	
3533	Interview with Abas Muhammad Mustafa al-Sayd - from the Ronni Shaked Prison Video Collection	
3556	Photo depicting scene of Park Hotel bombing	
3558	Park Hotel-Netanya 3/27/2002 News Footage CNN: Victims of Terror	
3580	CNN video re the Park Hotel bombing with an interview with Osama Hamdan	3/27/2002
3582	Photos depicting scene of Sheffield Club bombing	
3593	Photo depicting scene of Sheffield Club bombing	
3660	Picture of Hebrew U. aftermath	
3678	Photos of Bus No. 4 bombing	

<u>PX Number</u>	<u>Description</u>	<u>Date</u>
3687	Photo of Bus No. 4 bombing	
3688	Photo of Bus No. 4 bombing	
3689	Photos of Bus No. 4 bombing	
3763	Photo of Bus No. 37 bombing	
3799	Photos of Mike's Place scene	
3805	Photo of Mike's Place scene	
3816	Photo of Mike's Place scene	
3835	Raw Footage of Mike's Place Suicide Bombing	
4001	Pictures of Café Hillel scene	
4002	Picture of Tzippy Cohen at Café Hillel scene	
4017	A video clip of the Tel Romeda Attack that was filmed minutes after the terrorist was killed	10/22/2003
4020	Photograph taken by Wilder of scene after Tel Romeida shooting, showing one of the injured from Ben Itzak family	
4021	Photograph taken by Wilder of terrorist lying dead in the street	
4022	Photograph taken by Wilder of scene after Tel Romeida shooting, with terrorist wearing Hamas headband	
4023	Photograph taken by Wilder of scene after Tel Romeida shooting, with terrorist wearing Hamas headband	
4024	Photograph taken by Wilder of scene after Tel Romeida shooting, showing vehicle hit by bullets	
4025	Photograph taken by Wilder of scene after Tel Romeida shooting, showing bullets in Aparsemon family house	
4026	Photograph taken by Wilder of scene after Tel Romeida shooting, showing bullet fragments	
4075	Photo of Neve Dekalim bombing	
4078	Photo of Neve Dekalim bombing scene	

<u>PX Number</u>	<u>Description</u>	<u>Date</u>
4079	Photo of Neve Dekalim bombing scene	